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*Attorneys for Defendant Adam Shafi*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, )  
Plaintiff, ) NO. 15 Cr. 582 WHO  
v. ) STIPULATED MOTION AND  
ADAM SHAFI, ) "ORDER TO CONTINUE  
Defendant ) PRETRIAL CONFERENCE  
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The parties stipulate that the initial CIPA § 2 pretrial conference be continued from May 12, 2016 at 1:30 p.m. to June 16, 2016 at 1:30 p.m. The parties agree that this stipulated motion to continue the pre-trial conference may be granted based on this stipulated motion and the declaration of counsel below, and without oral argument.

## Declaration of Counsel

1. Along with Erik B. Levin, I represent Mr. Adam Shafi in the above-captioned matter and I submit this declaration based on information and belief.

2. The initial CIPA § 2 pretrial conference is currently scheduled for May 12, 2016.

3. The parties have agreed to continue the pretrial conference until the Court's June 16, 2016, calendar, based on the Court's unavailability on June 2, 2016, and the Court's full docket on June 9, 2016.

4. The parties agree that the nature of the prosecution (i.e., terrorism charge involving Foreign Intelligence Surveillance Act information) makes the case “complex” under the Speedy Trial Act. The parties further agree that discovery is ongoing and that additional time is required for effective preparation of counsel.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of May, 2016, at New York, New York.

/s/ Joshua L. Dratel  
Joshua L. Dratel

1 IT IS SO STIPULATED.

2 DATED: 5/5/16

3 BRIAN J. STRETCH

4 Acting United States Attorney

5 /s/ S. Waqar Hasib

6 S. Waqar Hasib, Esq.

7 Assistant United States Attorney

8 /s/ Joshua L. Dratel

9 Joshua L. Dratel, Esq.

10 Counsel for Adam Shafi

11 /s/ Erik B. Levin

12 Erik B. Levin, Esq.

13 Counsel for Adam Shafi

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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4 DATED: May 10, 2016  
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8 JUDGE WILLIAM H. ORRICK  
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